

THE HONORABLE JAMES L. ROBART

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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

PAUL J. BECK, et. al, Plaintiff, v. US BANK NATIONAL ASSOCIATION, et al. Defendant. ) Case No. C17-0882JLR ) UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO BAYVIEW MOTION TO DISMISS SECOND AMENDED COMPLAINT ) AND ORDER )

## STIPULATION

Comes now Plaintiffs, Paul Beck and Lin O. Beck, appearing through counsel, John A. Cochran and moves the Court for a Motion for Extension to Respond to Defendant's Motion to Dismiss Becks' Complaint. Defendant filed a motion to dismiss Plaintiff's complaint on August 11, 2017. Plaintiff asks the Court for an extension of time to respond to said Defendants' Motion to Dismiss for the following reasons:

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Plaintiff's Attorney had family emergency out of state and also several critical deadlines and trial throughout last few weeks of August and First week of September.

2.

UNOPPOSED MOTION FOR EXTENSION OF TIME  
TO RESPOND TO US BANK NA'S MOTION TO DISMISS  
BECK'S COMPLAINT - 1

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In effect, because of these various conflicts, it made it difficult to respond in full by the deadline for Plaintiff's response to Defendant's Motion to Dismiss. Additionally, Mr. Cochran and Mr. Laurick are attempting to discuss a settlement proposal consisting of cash for keys and a short sale and/or the latest temporary payment plan terms but have not come to terms on any exact proposal yet.

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Mr. Cochran has communicated that he needs an extension to Mr. Laurick, Counsel for Defendant and Mr. Laurick had no objection and did not oppose Mr. Cochran's request for extension to respond to Defendant's Motion to Dismiss. Mr. Laurick agreed to a two-week extension date of Tuesday, September 26, 2017.

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Defendants' counsel, James Laurick and Plaintiff's counsel, John A. Cochran have conferred and agree to set the Extension of the deadline to Respond to the Motion to Dismiss to Tuesday, September 26, 2017.

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Therefore, Plaintiff requests for an extension to Respond to Defendants' Motion to Dismiss to Tuesday, September 26, 2017.

Dated September 12, 2017

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UNOPPOSED MOTION FOR EXTENSION OF TIME  
TO RESPOND TO US BANK NA'S MOTION TO DISMISS  
BECK'S COMPLAINT - 2

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**ORDER:**

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IT IS THEREFORE ORDERED:

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Plaintiff is hereby granted an Extension of Time to Respond to Defendants' Motion to  
Dismiss until Tuesday, September 26, 2017.

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DATED: September 12, 2017

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HONORABLE JAMES L. ROBART

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UNOPPOSED MOTION FOR EXTENSION OF TIME  
TO RESPOND TO US BANK NA'S MOTION TO DISMISS  
BECK'S COMPLAINT - 3

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